

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:
SARAH PALIN,	:
	:
	: No. 17 Civ. 4853 (JSR)
Plaintiff,	:
	: ECF Case
	:
-against-	:
	:
	:
THE NEW YORK TIMES COMPANY and JAMES	:
BENNET,	:
	:
Defendants.	:
	:
-----	X

**NOTICE OF MOTION *IN LIMINE* FOR A RULING THAT  
THE CHALLENGED STATEMENTS ARE NOT DEFAMATORY *PER SE***

PLEASE TAKE NOTICE that Defendants The New York Times Company and James Bennet hereby respectfully submit their Motion *in Limine* asking that the Court rule, as a matter of law, that the statements at issue in Plaintiff's defamation claim are not defamatory *per se*. Defendants have served their papers in support of this motion on January 10, 2022, and will file their papers by January 17, 2022, and Plaintiff's answering papers are due on January 17, 2022. Pursuant to Rule 9 of the Court's Individual Rules of Practice, *in limine* motions are normally resolved on the morning of the first day of trial.

Dated: New York, New York  
January 10, 2022

Respectfully submitted,

BALLARD SPAHR LLP

By: /s/ David L. Axelrod  
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